

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

WISCONSIN ALUMNI RESEARCH
FOUNDATION,

Plaintiff,

Case No. 14-cv-00062-bbc

v.

APPLE INC.,

Defendant.

**PLAINTIFF WISCONSIN ALUMNI RESEARCH FOUNDATION'S ANSWER IN
RESPONSE TO APPLE INC.'S COUNTERCLAIMS**

Plaintiff Wisconsin Alumni Research Foundation ("WARF") responds as follows to the counterclaims alleged by Apple Inc. ("Apple") in its Answer to Complaint and Counterclaims. To the extent not specifically admitted, all allegations of Apple's counterclaims are denied by WARF.

RESPONSE TO APPLE'S COUNTERCLAIMS

I. Nature of the Action

1. WARF admits the allegations contained in Paragraph 1.
2. WARF admits the allegations contained in the first sentence of Paragraph 2.

WARF further admits that Apple alleges in its Answer that it does not infringe the '752 patent.

3. WARF admits the allegations contained in Paragraph 3.

II. Parties

4. WARF lacks knowledge or information sufficient to admit or deny the allegations contained in Paragraph 4, and therefore denies the same.

5. WARF admits the allegations contained in Paragraph 5.

III. Jurisdiction and Venue

6. WARF admits that these are counterclaims for a declaration of non-infringement and invalidity of each claim of the '752 patent. No answer is required to the remaining allegations contained in Paragraph 6, which consist of conclusions of law. To the extent an answer is required, WARF denies the remaining allegations contained in Paragraph 6.

7. No answer is required to the allegations contained in Paragraph 7, which consist of conclusions of law. To the extent an answer is required, WARF admits that the Court has personal jurisdiction over WARF.

8. No answer is required to the allegations contained in Paragraph 8, which consist of conclusions of law. To the extent an answer is required, WARF admits that venue is proper in this District.

IV. First Counterclaim

9. WARF repeats and realleges the allegations of the preceding Answer to Counterclaims Paragraphs 1-8.

10. WARF denies the allegations contained in Paragraph 10.

11. No answer is required to the allegations contained in Paragraph 11, which consist of conclusions of law. To the extent an answer is required, WARF denies the allegations contained in Paragraph 11.

V. Second Counterclaim

12. WARF repeats and realleges the allegations of the preceding Answer to Counterclaims Paragraphs 1-11.

13. WARF denies the allegations contained in Paragraph 13.

14. WARF denies the allegations contained in Paragraph 14.

15. No answer is required to the allegations contained in Paragraph 15, which consist of conclusions of law. To the extent an answer is required, WARF denies the allegations contained in Paragraph 15.

16. No answer is required to the allegations contained in Paragraph 16, which consist of conclusions of law. To the extent an answer is required, WARF denies the allegations contained in Paragraph 16.

17. WARF admits that the '752 patent alleges on its face a filing date of December 26, 1996. WARF denies any remaining allegations contained in Paragraph 17.

18. No answer is required to the allegations contained in Paragraph 18, which consist of conclusions of law. To the extent an answer is required, WARF denies the allegations contained in Paragraph 18.

19. No answer is required to the allegations contained in Paragraph 19, which consist of conclusions of law. To the extent an answer is required, WARF denies the allegations contained in Paragraph 19.

VI. Prayer for Relief

20. Apple's prayer for relief contains no allegations to which a response is required, but to the extent any answer is required, WARF denies that Apple is entitled to the requested relief or to any relief whatsoever.

Dated: April 16, 2014.

s/ Jennifer L. Gregor

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